

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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07-cv- 2856

SARAH LEVINE SIMON,

Plaintiff,

-against-

ANSWER TO
COMPLAINT

WILLIAMS & FUDGE, INC. and
VINCENT VALLONE,

Defendants.

- - - - - X

Defendants, WILLIAMS & FUDGE, INC. and VINCENT VALLONE, by their attorney Arthur Sanders, as and for their answer to the complaint of plaintiff, allege as follows:

1. Defendants deny knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in Paragraph "1" of the Complaint.

2. Defendants admit the allegation contained in Paragraph "2" of the Complaint.

3. Defendants deny the allegation contained in Paragraph "3" of the Complaint.

4. Defendants deny the allegation contained in Paragraph "4" of the Complaint.

5. Defendants admit the allegation contained in Paragraph "5" of the Complaint.

6. Defendants deny knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in Paragraph "6" of the Complaint.

7. Defendants admit the allegation contained in Paragraph "7" of the Complaint.

8. Defendants admit the allegation contained in Paragraph "8" of the Complaint.

9. Defendants admit the allegation contained in Paragraph "9" of the Complaint.

10. Defendants admit the allegation contained in Paragraph "10" of the Complaint.

11. Defendants admit the allegation contained in Paragraph "11" of the Complaint.

12. Defendants admit the allegation contained in Paragraph "12" of the Complaint.

13. Defendants admit the allegation contained in Paragraph "13" of the Complaint.

14. Defendants admit contacting plaintiff but otherwise deny knowledge or information sufficient to form a belief with respect to the truth of the allegations contained in Paragraph "14" of the Complaint.

15. Defendants deny the allegation contained in Paragraph "15" of the Complaint.

16. Defendants deny the allegation contained in Paragraph "16" of the Complaint.

17. Defendants deny the allegation contained in Paragraph "17" of the Complaint.

18. Defendants deny the allegation contained in Paragraph "18" of the Complaint.

19. Defendants admit the allegation contained in Paragraph "19" of the Complaint.

20. a. Defendants deny knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in Paragraph "20.a" of the Complaint.

b. Defendants deny the allegation contained in Paragraph "20.b" of the Complaint.

c. Defendants deny the allegation contained in Paragraph "20.c" of the Complaint.

d. Defendants deny the allegation contained in Paragraph "20.d" of the Complaint.

e. Defendants deny knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in Paragraph "20.e" of the Complaint.

f. Defendants deny the allegation contained in Paragraph "20.f" of the Complaint.

g. Defendants deny the allegation contained in Paragraph "20.g" of the Complaint.

h. Defendants deny the allegation contained in Paragraph "20.h" of the Complaint.

i. Defendants deny the allegation contained in Paragraph "20.i" of the Complaint.

21. Defendants deny the allegation contained in Paragraph "21" of the Complaint.

22. Defendants deny knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in Paragraph "22" of the Complaint.

23. Defendants deny the allegation contained in Paragraph "23" of the Complaint.

24. Defendants deny knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in Paragraph "24" of the Complaint.

25. Defendants deny the allegation contained in Paragraph "25" of the Complaint.

26. Defendants deny the allegation contained in Paragraph "26" of the Complaint.

27. Defendants deny the allegation contained in Paragraph "27" of the Complaint.

28. Defendants deny knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in Paragraph "28" of the Complaint.

29. Defendants deny the allegation contained in Paragraph "29" of the Complaint.

30. Defendants deny the allegation contained in Paragraph "30" of the Complaint.

31. Defendants deny the allegation contained in Paragraph "31" of the Complaint.

32. Defendants deny the allegation contained in Paragraph "32" of the Complaint.

33. Defendants deny the allegation contained in Paragraph "33" of the Complaint.

WHEREFORE, defendants, WILLIAMS & FUDGEK, INC. and VINCENT VALLONE, request Judgment dismissing the complaint with prejudice and denying all requested relief therein, together with such other and further relief as the Court deems just and proper, including costs and reasonable attorneys' fees.

Dated: Spring Valley, New York
June 15, 2007

/S/
ARTHUR SANDERS, ESQ. (AS-1210)
Attorney for defendants

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TO: BRIAN L. BROMBERG, ESQ. (BB-6264)
Attorney for plaintiff
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CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2007 the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Southern District's Local Rules, and or the Southern District's Rules On Electronic Service upon the following parties and participants:

Brian L. Bromberg, Esq.

/S/_____
ARTHUR SANDERS